

FILED
DISTRICT COURT OF GUAM

OCT 28 2005

MARY L.M. MORAN
CLERK OF COURT

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Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 05-00053-01
Plaintiff.)

vs.

**STIPULATION OF THE PARTIES
TO CONTINUE TRIAL DATE**

CHRISTOPHER ESPINOSA,)
Defendant.)

COMES NOW the United States, and respectfully requests and moves this Honorable Court for an Order continuing the trial date in the above entitled cause, which is currently scheduled for Tuesday, November 8, 2005 at 9:30 a.m., to Monday, January 9, 2006 at 9:30 a.m.

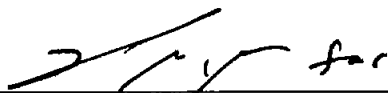
The United States makes this request because government counsel, Russell C. Stoddard, is currently off-island on emergency leave. The nature of the emergency is that he had to assist his wife with their home in Ft. Myers, Florida, in anticipation of Hurricane Wilma. During clean-up after the storm, Mrs Stoddard fell and broke her wrist and will require surgery which will delay AUSA Stoddard's return currently scheduled for November 8, 2005, until a week later. This case would be a real burden for another AUSA to pick up and try on such short notice.

Attorney G. Patrick Civile, counsel for defendant, had spoken to his client, and his client

1 has expressed no objections to the continuance of this trial. A request to continue the trial would
2 enable the defendant to obtain new counsel, as defendant has just filed a Motion to Discharge
3 Counsel and For Appointment of New Counsel.

4 Respectfully submitted this 28th day of October, 2005.

5 LEONARDO M. RAPADAS
6 United States Attorney
7 Districts of Guam and NMI

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RUSSELL C. STODDARD
First Assistant U.S. Attorney

CIVILLE & TANG, PLLC

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G. PATRICK CIVILLE
12 Attorney for Defendant
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